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December 30, 2013

**VIA FEDERAL EXPRESS**

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

**RE: Freedom of Information Act Request – Leeds Metals Site, Leeds, Maine**

Dear FOIA Officer:

This is a formal request for public records pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”) on behalf of our client, Rumford Paper Company. In accordance with FOIA, your written response is requested within twenty (20) working days.

We request that the U.S. Environmental Protection Agency, Region 1 (“EPA”) provide to my attention a copy of the following documents:

All Public Records which relate to the following:

1. All Public Records relating to the Leeds Metal Superfund Site, Leeds, Maine (the “Leeds Site”) that identify or otherwise refer to Rumford Paper Company, Mead Oxford Corporation, MeadWestvaco Oxford Corporation, Boise Cascade Corporation, Ethyl Corporation, or Oxford Paper Company (collectively, “RPC”);
2. All Public Records relating to the Leeds Site, that identify or otherwise refer to RPC in connection with the following entities:
  - A. National Metal Converters
  - B. Leeds Metal, Inc.
  - C. Michael Schiavone & Sons, Inc.
  - D. Schiavone of Maine, Inc.
  - E. Michael Schiavone
  - F. Maine Central Railroad
  - G. Pan Am Railways

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3. All Public Records relating to the Leeds Site that identify or otherwise refer to RPC that: (a) have been provided by MEDEP to the U.S. Environmental Protection Agency ("EPA") or the Office of the Attorney General (AG); and (b) have been provided to MEDEP by the EPA or the AG; and
4. All Public Records regarding any and all communications between MEDEP and EPA regarding the relationship between RPC and the Leeds Site.

To the extent that EPA at one time had possession or control of responsive records which are covered by this request, but no longer has possession or control of those materials, please identify any such records.

If EPA objects to the provision of any of the requested records on the basis that they are not subject to the FOIA or otherwise not subject to disclosure, in accordance with FOIA, please identify in writing each document to which EPA denies access and provide the legal basis for that denial.

For purposes of this request, the following terms have the indicated meanings:

1. "Public Records" means all records as defined by 5 U.S.C. § 552(f)(2), as well as all documents, letters, memoranda, notes, minutes, e-mail (electronic mail), studies (including all data, measurements, estimates, calculations, and/or analysis received, used or produced in conjunction with any study), testing results, data, analysis, measurements, estimates, calculations, workpapers, reports, drafts, telephone logs, message slips or any recordation of messages, photographs, sketches, drawings, and maps produced, received, in the possession or control of EPA whether actually on paper or some other hard copy or contained on some form of computer, magnetic, or optical media (including information on computer hard-drives and backup tapes or CDs) or the like, and includes, but is not limited to, any internal communications between and among employees (both staff and management) of EPA and between and among EPA and the Maine Department of Environmental Protection. Public Records shall include without limitation any communications made by EPA employees whether such communications were made from or through computers located at an employee's place of residence, their workplace or elsewhere.
2. "EPA" means the U.S. Environmental Protection Agency, its headquarters and regional offices, and all employees, consultants and contractors thereof.

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Thank you for your cooperation. If search and copying costs are anticipated to exceed \$500.00, please provide me an estimate of costs prior to processing this request.

Very truly yours,



Sharon G. Newman

SGN/bh